

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
UNITED STATES OF AMERICA	)	
	)	
v.	)	Cr. No. 04-10117-RWZ
	)	
DARREN FRANKLIN	)	
_____	)	

**DEFENDANT'S MOTION FOR AUTHORIZATION TO INCUR  
EXPENSES FOR DRUG TESTING**

Defendant, by his attorney, hereby moves this Court to authorize him to incur expenses in an amount not to exceed Two Thousand Five Hundred (\$2500.00) Dollars for the purpose of obtaining an expert review of the data upon which the government's analyses of the drugs seized in this case are based and an independent weighing of the drugs seized by the government in the above case. As grounds therefor, defendant states:

1. The identification and the weight of the drugs seized by the government from defendant in connection with several undercover controlled buys and the search of the trunk of his motor vehicle are essential elements of the offenses with which he is charged and are critical determinants of the sentence which he would face, if convicted. For that reason, it is important that an independent expert review the underlying testing data on which the drug analyses are based and weigh the drugs.

2. Defendant has consulted with Harvey M. Cohen, Ph.D., a chemist with Cambridge Technical Associates, with respect to his

review of the data and weighing the drugs. Dr. Cohen charges \$250.00 per hour for his services and estimates that his work in this case would not require more than 10 hours of his time.

WHEREFORE, defendant prays that this Court authorize him to incur expenses in an amount not to exceed \$2500.00 for independent review of the drug analyses and weighing of the drugs seized by the government.

Respectfully submitted,

/s/ Jonathan Shapiro  
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Dated: March 29, 2006

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